

AKERMAN LLP

1635 VILLAGE CENTER CIRCLE, SUITE 200
LAS VEGAS, NEVADA 89134
TEL.: (702) 634-5000 – FAX: (702) 380-8572

MELANIE D. MORGAN, ESQ.
Nevada Bar No. 8215
SCOTT R. LACHMAN, ESQ.
Nevada Bar No. 12016
DONNA M. WITTIG, ESQ.
Nevada Bar No. 11015
AKERMAN LLP
1635 Village Center Circle, Suite 200
Las Vegas, Nevada 89134
Telephone: (702) 634-5000
Facsimile: (702) 380-8572
Email: melanie.morgan@akerman.com
Email: scott.lachman@akerman.com
Email: donna.wittig@akerman.com

Attorneys for Bank of America, N.A.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BIG ROCK ASSETS MANagements, LLC,
a Nevada limited liability company,

Plaintiff,

v.

NATIONAL DEFAULT SERVICING
CORPORATION, an Arizona corporation;
BANK OF AMERICA, N.A., a national banking
association; DOES I through X; and ROE
BUSINESS ENTITIES I through X, inclusive,

Defendants.

Case No. 2:22-cv-01543-APG-EJY

**STIPULATION AND ORDER TO
EXTEND BRIEFING DEADLINES**

(FIRST REQUEST)

Plaintiff Big Rock Assets Management, LLC and defendant Bank of America, N.A. (**BANA**) stipulate to extend the responsive deadlines as follows:

BANA shall have an additional twenty-one (21) days, up to and including **February 27, 2023**, to file its opposition to Big Rock's motion to remand and for attorney's fees under 28 U.S.C. 1447 (c) (**motion to remand**), which is currently due on February 6, 2023. ECF Nos. 15-16. Big Rock filed its motion to remand on January 23, 2023. *Id.*

BANA shall have an additional twenty-one (21) days, up to and including **February 28, 2023**, to file its opposition to Big Rock's motion to stay proceedings on defendant Bank of America's

1 motions to dismiss [ECF No. 13] and expunge lis pendens [ECF No. 14] and motion for order
 2 shortening time pursuant to LR IA-6-1 (**motion to stay**), which is currently due on February 7, 2023.
 3 ECF Nos. 17 & 18. Big Rock filed its motion to stay on January 24, 2023. *Id.*

4 Big Rock shall have until ten (10) days after this court rules on the motion to stay to file its
 5 opposition to BANA's motion to dismiss and expunge lis pendens (**motion to dismiss**), which is
 6 currently due on February 6, 2023. ECF Nos. 13 & 14. BANA filed its motion to dismiss on
 7 January 23, 2023. *Id.*

8 The parties are requesting additional time due to ongoing settlement negotiations in this case
 9 and other related cases. BANA also requests additional time to secure Federal Housing Finance
 10 Agency approval on its opposition briefs. Big Rock also requests additional time to avoid having to
 11 draft a response to BANA's motion to dismiss if the court grants its motion to stay. This is the
 12 parties' first request for an extension of these deadlines, and is not intended to cause any delay or
 13 prejudice to any party.

14 DATED this 31st day of January, 2023.

AKERMAN LLP	HONG & HONG LAW OFFICE
<p>15 <u>/s/ Scott R. Lachman</u></p> <p>16 MELANIE D. MORGAN, ESQ.</p> <p>17 Nevada Bar No. 8215</p> <p>18 SCOTT R. LACHMAN, ESQ.</p> <p>19 Nevada Bar No. 12016</p> <p>20 DONNA M. WITTIG, ESQ.</p> <p>21 Nevada Bar No. 11015</p> <p>22 1635 Village Center Circle, Suite 200</p> <p>23 Las Vegas, NV 89134</p> <p>24 <i>Attorneys for Bank of America, N.A.</i></p>	<p>15 <u>/s/ Joseph Y. Hong</u></p> <p>16 JOSEPH Y. HONG, ESQ.</p> <p>17 Nevada Bar No. 5995</p> <p>18 1980 Festival Plaza Drive, Suite 650</p> <p>19 Las Vegas, NV 89135</p> <p>20 <i>Attorney for Big Rock Assets Management,</i></p> <p>21 <i>LLC</i></p>

24 IT IS SO ORDERED.

25 
 26 UNITED STATES MAGISTRATE JUDGE
 27 Case No. 2:22-cv-01543-APG-EJY

28 DATED: January 31, 2023